REMARKS

This Amendment is submitted in response to the Office Action dated December 12, 2012, having a shortened statutory period set to expire March 12, 2013.

I. Rejection of Claims 2-8, 11-12, 14-17, 20-21, 23-26, 28-35 under 35 U.S.C. § 112, 1st paragraph, for lack of enablement

At page 3 of the present Office Action, the Examiner has reinstituted the rejection of Claims 2-8, 11-12, 14-17, 20-21, 23-26, 28-35 under 35 U.S.C. § 112, 1st paragraph, as failing to comply with the enablement requirement based upon a belief that "analyzing the data page" as recited in Claims 28-30 is "not described in the specification in such a say as to enable one skilled in the art … to make and/or use the invention." The Examiner previously withdrew this rejection in response to Applicant's Appeal Brief dated September 27, 2010, as indicated in the Examiner's Answer dated December 9, 2010. The rejection under 35 U.S.C. § 112, 1st paragraph, is still in error and should again be withdrawn.

A. Legal standard for enablement and examination procedure for rejections for non-enablement

As set forth in MPEP 2164.01, the enablement requirement of 35 U.S.C. § 112, 1st paragraph, mandates:

> … the claimed invention be enabled so that any person skilled in the art can make and use the invention without undue experimentation. *In re Wands*, 858 F.2d at 737, 8 USPQ2d at 1404 (Fed. Cir. 1988). See also *United States v. Telectronics, Inc.,* 857 F.2d 778, 785, 8 USPQ2d 1217, 1223 (Fed. Cir. 1988)("The test of enablement is whether one reasonably skilled in the art could make or use the invention from the disclosures in the patent coupled with information known in the art without undue experimentation.").

Further guidance regarding a determination of enablement or non-enablement is found in MPEP 2164.01(a), which states in relevant part:

There are many factors to be considered when determining whether there is sufficient evidence to support a determination that a disclosure does not satisfy the enablement requirement and whether any necessary experimentation is "undue." These factors include, but are not limited to:

(A) The breadth of the claims;

(B) The nature of the invention;

(C) The state of the prior art;

(D) The level of one of ordinary skill;

(E) The level of predictability in the art;

(F) The amount of direction provided by the inventor;

(G) The existence of working examples; and

(H) The quantity of experimentation needed to make or use the invention based on the content of the disclosure.

In re Wands, 858 F.2d 731, 737, 8 USPQ2d 1400, 1404 (Fed. Cir. 1988) … .

It is improper to conclude that a disclosure is not enabling based on an analysis of only one of the above factors while ignoring one or more of the others. The examiner's analysis must consider all the evidence related to each of these factors, and any conclusion of nonenablement must be based on the evidence as a whole. 858 F.2d at 737, 740, 8 USPQ2d at 1404, 1407.

MPEP 2164.01(a), emphasis supplied.

B. Examiner's rejection fails to satisfy basic procedural standard for rejections for non-enablement

In apparent recognition of the Examiner's previous failure to analyze the eight factors set forth in *In re Wands*, the Examiner asserts at pages 3-4 of the Office Action, "A person skill [sic] in the art would like to be able to examine how the orientation drives from the line width." The Examiner additionally cites Chen et al., "Landscape image analysis using fuzzy adaptive resonance theory," IEEE SMC '99 Conference Proceedings, Vol. 3 (1999) (hereinafter *Chen*)

and Kayanuma et al., "A new method to detect object [sic] and estimate the position and the orientation from an image using a 3-D model having feature points," IEEE SMC '99 Conference Proceedings, Vol. 3 (1999) (hereinafter *Kayanuma*), urging Applicant to "see the following NPLs illustrating algorithms, fuzzy method [sic] and comparing objects in order to recognize the object/line orientation on a page."

1. Examiner's does not consider all evidence related to all eight *In re Wands* factors

As an initial matter, Applicant notes that the Examiner has still not evaluated on the record all the evidence related to each of the eight factors set forth in *In re Wands* as mandated by MPEP 2164.01(a). At most, the Examiner's citation to *Chen* and *Kayanuma* could be said to be an attempt to evaluate the state of the prior art, one of the eight *In re Wands* factors. (However, *Chen* and *Kayanuma* are inapposite to the claimed invention and therefore do not even provide information relevant to the state of the prior art.). Further, the Examiner has failed to evaluate at all the objective evidence related to the state of the prior art, including that provided by Applicant, namely, W3C, "HTML 4.01 Specification, W3C Recommendation," December 24, 1999. Because the Examiner has failed to evaluate on the record all the evidence related to each of the eight factors set forth in *In re Wands* as mandated by MPEP 2164.01(a), the Examiner has failed to establish a *prima facie* case of nonenablement under 35 U.S.C. § 112, 1st paragraph, and the rejection of the claims under 35 U.S.C. § 112, first paragraph, is, in the words of MPEP 2164.01(a), "improper."

2. References relied on by the Examiner do not provide evidence of the state of the prior art

Turning now to the references cited by the Examiner, *Chen* discloses an analysis system that employs a fuzzy adaptive resonance theory (ART) algorithm to identify natural objects in images of landscape scenery (*Chen*, Abstract). In the fuzzy ART algorithm, pixels are first clustered on their normalized gray value and vertical position (*Chen*, p. III-85). The pixel clusters are then assigned membership to image features (e.g., a road, tree, sky, lake, etc.) using a Gaussian membership function and a merging function (*Chen*, p. III-85). Thus, *Chen* discloses an automated system for identifying landscape features in an image. While interesting, *Chen's*

disclosure has nothing to do with the claimed feature of "determining, by analyzing the data page, an orientation for presentation of the data page relative to the first and second dimensions of the display" as recited in exemplary Claim 28 or "determining a line width of textual content of the data page" as recited in exemplary Claim 31. Consequently, the Examiner's citation of *Chen* is completely inapposite to the claims rejected under 35 U.S.C. § 112, 1st paragraph, and provides no support for the Examiner's improper rejection.

Kayanuma is similarly inapposite to the claims rejected under 35 U.S.C. § 112, 1st paragraph, and does not support the Examiner's rejection. *Kayanuma* discloses a technique for detecting a representation of a three-dimensional object in a two-dimensional image using a genetic algorithm and to estimate the object's position and orientation (*Kayanuma*, Abstract). *Kayanuma's* detection technique includes detecting pixels with a particular color vector as possible feature points, segmenting image pixels into regions of a threshold size and storing the regions in a look-up table, then reducing the resolution of the look-up table by mosaiking and smoothing, and finally comparing the input image to the look-up table (*Kayanuma*, p. IV-933 to IV-934). Again, like *Chen*, *Kayanuma's* disclosure has nothing to do with the claimed feature of "determining, by analyzing the data page, an orientation for presentation of the data page relative to the first and second dimensions of the display" as recited in exemplary Claim 28 or "determining a line width of textual content of the data page" as recited in exemplary Claim 31. Consequently, the Examiner's citation of *Kayanuma* is completely inapposite to the claims rejected under 35 U.S.C. § 112, 1st paragraph, and provides no support for the Examiner's improper rejection.

3. Examiner's position with respect to claimed "analyzing the data page" is self-contradictory

Applicant finally respectfully points out that the Examiner's position with respect to the claimed step of "analyzing the data page" is self-contradictory. In the rejection under 35 U.S.C. § 112, 1st paragraph, set forth at page 3 of the present Office Action, the Examiner asserts that a person skilled in the art at the time of the present invention would not be enabled to implement the claimed step of "analyzing the data page" in light of the disclosure provided by the present specification. At pages 11-12 of the present Office Action, the Examiner then cites two

references – *O'Gorman* and *Goto* – as teaching the specific technique of analyzing the data page set forth in dependent Claim 31. Logically, if the specific technique of analyzing the data page recited in Claim 31 were so well known in the art as to be taught by two references, then the present specification need not provide any further detail beyond enumerating the step of analyzing the data page to enable a skilled artisan to make and use the claimed invention. See, e.g., MPEP 2164.01, "A patent need not teach, and preferably omits, what is well known in the art."

C. Present specification is enabling to those skilled in the art

Further, if the objective evidence of record is actually considered, that objective evidence mandates a conclusion that the present specification would have enabled a person skilled in the art at the time of the present invention to make and use the "analyzing" step of exemplary Claim 28. For example, the present specification discloses:

> The device then displays the page in the default orientation (step 315), which will be referred to as Display Mode1. The user can set the default orientation to either the wide or narrow orientation. Alternatively, the device can automatically determine the best-fit orientation for the display. By examining the line-width of the text being received, the device will determine whether the wide or narrow orientation will be used as the default orientation for that set of text.

Specification, page 7, line 23 *et seq*., emphasis supplied. Thus, the present specification teaches that the portable device can examine the line width of the data page to determine the display orientation.

The present specification additionally teaches that the data pages presented by the portable device can be Web pages. For example, for example, page 3, line 17 *et seq*. teaches:

> The preferred embodiment is particularly adapted to displaying Web data on wireless devices such as a portable telephone, wherein the Web data can be effectively displayed by flipping the display orientation between the narrow and

wide dimensions of the display. The flipping between screen orientations can be selected by user action or done dynamically by the portable device itself.

Similarly, page 7, lines 17-21 of the specification disclose:

> … the user first requests a web page, or other data page, using the wireless device (step 305). Next, the device receives the requested web page, or a truncated wireless markup language (WML) version of the requested web page (step 310).

Those skilled in the art at the time of the present invention well understood that the "Web data" or "web page" described in the present specification was typically received at the portable device (e.g., portable telephone) in HyperText Markup Language (HTML) or wireless markup language (WML).

1. HTML 4.01 Specification

At the time of the present invention, HTML was defined by the HTML 4.01 Specification previously submitted by Applicant to the Office (e.g., W3C, "HTML 4.01 Specification, W3C Recommendation," December 24, 1999 ("This specification defines the HyperText Markup Language (HTML), the publishing language of the World Wide Web.")). The HTML syntax defined by the HTML 4.01 Specification included constructs explicitly specifying the line width of Web page elements, including text, columns, images, objects and applets. For example, the line width of text can be defined in HTML as described at page 97 in section 9.3.4; the line width of columns can be defined in HTML as described at page 113 in section 11.2.1 and again at pages 122-123; and the line width of images, objects and applets can be defined in HTML as described page 179 in section 13.7.1. Thus, those skilled in the art at the time of the present invention would readily have appreciated from the present specification that an examination of line width as taught at page 7, line 23 *et seq*. could include an examination of the underlying HTML code of a webpage to determine the best orientation for presentation of the Webpage given the line width specified by the HTML code. The Examiner should further appreciate that the foregoing discussion of the capabilities of HTML addresses the Examiner's rhetorical questions posed with respect to dependent Claims 31-34 at page 3 of the present Office Action (viz. "how does it work with different font sizes?" What if the data page is a picture/image in a web page?).

2. WML 1.3 Specification

The present specification further discloses that the data page may be received in the portable device in wireless markup language (WML), which is described in "Wireless Application Protocol Wireless Markup Language Specification," Version 1.3, Wireless Application Protocol Forum, Ltd., February 19, 2000, a copy of which is submitted herewith and referred to as "WML 1.3 Specification." The WML 1.3 Specification discloses that the basic container of text and input elements is called a "card," which "indicates the general layout and required input fields, but does not overly constrain the user agent implementation in the areas of layout or user input "(WML 1.3 Specification, p. 55). As described in Sections 11.8.3 and 11.8.4 on pages 75-76 of the WML 1.3 Specification, the user device can determine how to flow lines that are "too long to fit on the screen," subject to hard-coded specification in WML of the line-

wrapping mode (i.e., "nowrap" or "wrap"), the presence of non-breaking spaces (i.e., " "), and line breaks (i.e., "br"). Section 11.9 at page 81 of the WML 1.3 Specification further discloses that WML can explicitly specify the height and width of an image to be rendered on a card:

> These attributes give user agents an idea of the size of an image or object so that they may reserve space for it and continue rendering the card while waiting for the image data. User agents may scale objects and images to match these values if appropriate. If `length` is specified as a percentage value, the resulting size is based on the available horizontal or vertical space, not on the natural size of the image.

Thus, the WML 1.3 Specification teaches that at the time of the present invention, those skilled in the art understood how to program a user device to determine how many textual characters would be displayed in a given line of the display a user device and to properly render images (i.e., how to analyze a data page) given the display size constraints of typical user devices (see, e.g., WML 1.3 Specification, Section 4.3).

Given the clear enabling disclosure of the present specification, particularly when read in light of knowledge well known to those skilled in the art at the time of the present invention, the present specification clearly enables a person of ordinary skill in the art at the time of the invention to make and use a portable device that "analyz[es] the data page to determine an orientation for presentation of the data page relative to the first and second dimensions of the display" without undue experimentation. The rejection of all pending claims under 35 U.S.C. § 112, 1st paragraph, is therefore not well founded and should be withdrawn.

II. Rejection of Claims 2-8, 11-12, 14-17, 20-21, 23-26, 28-30 and 35 under 35 U.S.C. § 103

At page 4 of the present Office Action, Claims 2-8, 11-12, 14-17, 20-21, 23-26, 28-30 and 35 are rejected under 35 U.S.C. § 103(a) as unpatentable over U.S. Patent No. 5,661,632 to

Register and further in view of U.S. Patent No. 6,453,173 to *Reber et al*. (*Reber*). That rejection is respectfully traversed, and favorable reconsideration of the claims is requested.

A. Disclosure of *Register* and *Reber*

1. *Register*

As indicated by its title, *Register* discloses a "hand held computer with dual display screen orientation capability controlled by toggle switches." At col. 2, line 61 *et seq.*, Register discloses that the handheld computer can present content on its display in either portrait or landscape orientation:

> Turning now to FIGS. 4 and 5, according to a primary aspect of the present invention, the handheld computer 10 is specially designed to be operated by a user in a selectively variable one of two different display screen orientations--a "portrait" orientation (FIG. 4) in which the length of the display screen 26 is vertically oriented, and a "landscape" orientation (FIG. 5) in which the length of the display screen is horizontally oriented and rotated ninety degrees in a counterclockwise direction from its FIG. 4 portrait orientation.

As made clear at col. 3, line 65 *et seq.*, *Register* discloses that the user determines the orientation of the presentation of content on the display of the handheld computer by manual manipulation of toggle buttons:

> According to a key aspect of the present invention, to accommodate this reorientation of the computer 10 the orientation of its display screen image 52, as well as the command text and/or graphics C within the command icons 54a, 54b may be similarly rotated ninety degrees in a clockwise orientation using one of the toggle buttons 28, 30, 32 and 34 (representatively the toggle button 34). As may be seen by comparing FIGS. 4 and 5, this display reorientation causes both the display screen image 52 and the command text and/or graphics C to be in an "upright" viewing orientation when the computer is shifted from its FIG. 4 portrait orientation to its FIG. 5 landscape orientation. In a manner subsequently

described herein the orientation of the display screen image 56 and the command text and/or graphics C may be also switched back to their FIG. 4 portrait orientation using the toggle button 34.

2. *Reber*

As indicated in its Abstract and Figures 4-8, *Reber* discloses a handheld device, such as a mobile telephone, having an optical data reader mounted on an exterior surface of its housing. The optical data reader can be, for example, a bar code reader (*Reber*, col. 6, lines 30-33). *Reber* further discloses that "the optical reader 340 can comprise a scanning beam optical reader which scans a light beam along a first axis 346 for a first orientation of the handheld device. The first orientation is sensed by at least one of the orientation sensors 48 and 49 described with reference to FIG. 1" (*Reber*, col. 12, lines 13-17). *Reber* further discloses, "The embodiment … is advantageous in automatically varying the scanning axis of the light beam in dependence upon the orientation of the handheld device. Regardless of whether the handheld device is oriented to display content in a portrait mode (FIG. 9) or in a landscape mode (FIG. 10), the light beam is scanned horizontally to read horizontally-oriented bar codes" (*Reber*, col. 13, lines 4-10). Thus, *Reber* discloses a handheld device having an optical scanner that scans horizontally regardless of the orientation of the handheld device based on inputs from sensors.

B. Combination of *Register* and *Reber* is improper

As an initial matter, Applicant respectfully traverses the rejection under 35 U.S.C. § 103 because the combination of references is improper as lacking support by articulated reasoning with a rational underpinning as required by the holdings of *Graham v. John Deere Co.*, 383 U.S. 1 (1966) and *KSR Int'l Co. v. Teleflex Inc.,* 550 U.S. 398 (2007).

In arguing for the combination of references, page 6 of the present Office Action states:

Thus it would have been obvious to one of ordinary skill in the art to modify the teachings of Reber's light beam into Register's toggle switches in order automatically [sic] varying an axis of a scanning light beam in dependence upon an orientation of the handheld device.

1. Examiner does not provide articulated reasoning with a rational underpinning as required under *KSR*

The Examiner's argument for the combination of cited references lacks the legally required articulated reasoning with rational underpinning because it is plainly nonsensical. Specifically, the Examiner asserts, without any supporting reasoning, that it would have been obvious to incorporate *Reber's* scanning beam optical reader into *Register's* toggle switches. Applicant is at a loss to understand what the Examiner believes would result from the combination of a scanning beam optical reader and toggle switches, how such a combination would technically and structurally be made, or why a skilled artisan would be motivated by the teachings of the references to make such an inoperative and useless amalgamation. Because the Examiner's supposed reasoning in support of the combination of *Register* and *Reber* lacks the legally required articulated reasoning with rational underpinning, Applicant respectfully submits that the rejection under 35 U.S.C. § 103 is overcome.

2. Combination of references does not disclose or other render obvious the modifications required to obtain the claimed invention

The Examiner's argument for the combination of cited references also lacks the legally required articulated reasoning with rational underpinning because neither the references themselves nor knowledge of those skilled in the art discloses the modification to the combination of references required to obtain the claimed invention. As noted above, *Register* discloses a handheld devices that modifies the orientation of content displayed on a display device of the handheld device based on user manipulation of toggle buttons, and *Reber* discloses a handheld device having an scanning beam optical reader that scans horizontally regardless of the orientation of the handheld device based on inputs from orientation sensors. Regardless of what device the Examiner believes to result from the combination of *Register* and *Reber*, it is clear that nothing in the combination of references discloses "the portable device determining, by analyzing the data page, an orientation for presentation of the data page relative to the first and second dimensions of the display" as recited in exemplary Claim 28. Consequently, there is a gap between the reference teachings and the claimed invention that can only be bridged by substantial modification of the reference teachings. The record contains no objective evidence or even any argumentation that an ordinarily skilled artisan at the time of the present invention

would have been motivated to make such a modification or would have found such a modification obvious. Consequently, the rejection under 35 U.S.C. § 103 clearly fails to satisfy the legal requirements that the rejection be supported by articulated reasoning with rational underpinning and should therefore be withdrawn.

C. Combination of *Register* and *Reber* does not disclose each feature of exemplary Claim 28

The combination of *Register* and *Reber* does not render exemplary Claim 28 unpatentable under 35 U.S.C. § 103 because that combination of references does not disclose or render obvious the "determining" step set forth in exemplary Claim 28 as follows:

> the portable device determining, by analyzing the data page, an orientation for presentation of the data page relative to the first and second dimensions of the display.

With reference to this feature, page 5 of the Final Office Action cites Figures 4-5 of *Register*, erroneously claiming:

> the prior art Register in figs. 4-5 teaches the steps of the claim, because the display screen image #26 of fig. 4 is displayed in a second orientation (see fig. 5 #52), and this would have been obvious to one of ordinary skill in the art to equate as analyzing the data page i.e. the display screen image #26 of fig. 4 into #52 of fig. 5)

Applicant respectfully traverses the Examiner's position because it is manifestly contrary to the plain teaching of the references. As noted above, the combination of *Register* and *Reber* discloses only that a user can toggle between portrait and landscape display modes using manually manipulable toggle buttons on a handheld computer 10. The combination of *Register* and *Reber* utterly fails to disclose, suggest or motivate a portable device determining the orientation of presentation of a data page by analyzing the data page.

Applicant further respectfully traverses the Examiner's position because it is directly contrary to the findings of the Patent Trial and Appeal Board. In the decision of the Board dated June 26, 2012, the Board explicitly held that the combination of *Register* and *Reber* discloses that "the orientation is manually selected by the user" (Decision on Appeal, p. 5). Consequently, Applicant respectfully submits that the Examiner's findings directly contrary to Board's decision are in error and should be explicitly withdrawn.

In view of the foregoing reasons, Applicant respectfully submits that the rejection of exemplary Claim 28, similar Claims 29-30, and their respective dependent claims under 35 U.S.C. § 103 in view of the combination of *Register* and *Reber* is not well founded and should be withdrawn.

D. Combination of *Register* and *Reber* does not disclose each feature of Claim 35

The combination of *Register* and *Reber* also does not render Claim 35 unpatentable under 35 U.S.C. § 103 because that combination of references does not disclose or render obvious the "determining" step set forth in Claim 28 as follows:

> in response to receiving a data page in the portable device, the portable device automatically determining, based on a dimension of the data page, an orientation of presentation of the data page relative to orthogonal first and second dimensions of the display.

With reference to this feature, page 5 of the Final Office Action cites Figures 4-5 of *Register*, erroneously claiming:

> the prior art Register in figs. 4-5 teaches the steps of the claim, because the display screen image #26 of fig. 4 is displayed in a second orientation (see fig. 5 #52), and this would have been obvious to one of ordinary skill in the art to equate as analyzing the data page i.e. the display screen image #26 of fig. 4 into #52 of fig. 5)

Applicant respectfully traverses the Examiner's position because it is manifestly contrary to the plain teaching of the references. As noted above, the combination of *Register* and *Reber* discloses only that a user can toggle between portrait and landscape display modes using manually manipulable toggle buttons on a handheld computer 10. The combination of *Register* and *Reber* utterly fails to disclose, suggest or motivate a portable device determining an orientation of presentation of a data page, and particularly fails to disclose a portable device doing so based on a dimension of the data page.

Applicant further respectfully traverses the Examiner's position because it is directly contrary to the findings of the Patent Trial and Appeal Board. In the decision of the Board dated June 26, 2012, the Board explicitly held that the combination of *Register* and *Reber* discloses that "the orientation is manually selected by the user" (Decision on Appeal, p. 5). Consequently, Applicant respectfully submits that the Examiner's findings directly contrary to Board's decision are in error and should be explicitly withdrawn.

In view of the foregoing reasons, Applicant respectfully submits that the rejection of Claim 35 and their respective dependent claims under 35 U.S.C. § 103 in view of the combination of *Register* and *Reber* is not well founded and should be withdrawn.

E. Combination of *Register* and *Reber* does not disclose each feature of exemplary Claim 6

The rejection of exemplary Claim 6 under 35 U.S.C. § 103 in view of *Register* and *Reber* is similarly not well founded and should be withdrawn.

At page 8 of the Final Office Action, the Examiner asserts without any basis that the features recited in Claim 6 would have been obvious to those skilled in the art, stating "it would have been obvious to skilled [sic] in the art to recognize that Register and Reber's handheld devices redisplaying the data page in both orientations and of course there should be a delay period between the two orientations." In response, Applicant respectfully submits that the Examiner's unsupported assertion of obviousness does not have any evidential weight and further does not satisfy the legal requirement that an obviousness rejection be supported by articulated reasoning with rational underpinning, as set forth in *KSR*. Consequently, the Examiner has failed to make a *prima facie* case of obviousness with respect to Claim 6 or similar Claims 15 and 24, and the rejection of these claims under 35 U.S.C. § 103 should be withdrawn.

F. Combination of *Register* and *Reber* does not disclose each feature of exemplary Claim 7

The rejection of exemplary Claim 7 under 35 U.S.C. § 103 in view of *Register* and *Reber* is similarly not well founded and should be withdrawn.

At page 8 of the Final Office Action, the Examiner notes that *Register* fails to disclose a "wireless telephone" as recited in Claim 7, but instead discloses a personal digital assistant. Because the Examiner has failed to make a *prima facie* case of obviousness with respect to Claim 7 by asserting that the combination of prior art references discloses what is claimed, Applicant respectfully submits that the rejection of Claim 7 and similar Claims 16 and 25 under 35 U.S.C. § 103 is not well founded and should be withdrawn.

III. Rejection of Claims 31-34 under 35 U.S.C. § 103

At page 11 of the present Office Action, Claims 31-34 are rejected under 35 U.S.C. § 103(a) as unpatentable over *Register, Reber,* and further in view of *O'Gorman, L*, "The

document spectrum for page layout analysis," IEEE Transactions on Pattern Analysis and Machine Intelligence," Vol. 15, No. 11, pp. 1162-1173 (1993), referred to herein as *O'Gorman*. That rejection is respectfully traversed for at least the reasons set forth above with reference to exemplary Claim 28.

IV. Rejection of Claims 31-34 under 35 U.S.C. § 103

At page 12 of the present Office Action, Claims 31-34 are rejected under 35 U.S.C. § 103(a) as unpatentable over *Register, Reber,* and further in view of *Goto, H. et al*., "A framework for detecting and selecting text line candidates of correct orientation," Proceedings of the Fourteenth International Conference on Pattern Recognition, Vol. 2, pp. 1074-1076 (1998), referred to herein as *Goto*. That rejection is respectfully traversed for at least the reasons set forth above with reference to exemplary Claim 28.

V. Summary

Having now responded to each rejection set forth in the present Office Action, Applicant respectfully submits all pending claims are now in condition for allowance.

No additional fee is believed to be required. If, however, any additional fees are required, please charge those fees to IBM Corporation Deposit Account No. **09-0447**.

Respectfully submitted,

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